

**EPA Technical Comments – Mountain Valley Pipeline Supplemental Information**  
**LRH 2015-00592-GBR; LRP 2015-798; NAO 2015-0898**

EPA acknowledges the on-going efforts to collect baseline data for aquatic resources that will be temporarily crossed by the project. However, the documentation states an inability to collect baseline stream data on several reaches due to limited access and/or safety concerns. EPA recommends clarifying the safety concerns and access issues and how they will be dealt with should the project be approved to temporarily impact the aquatic resources with such considerations. Additionally, EPA is concerned that without appropriate reference reach data it will be difficult to evaluate the success of the restored stream reaches. When appropriate, EPA recommends using least disturbed reference sites with similar characteristics such as, but not limited to, geographic position, topography, gradient, flow regime, pattern, profile, and dimensions of the channel as well as similar physical, chemical, and biological qualities of the stream that will be impacted. Furthermore, it is unclear if reference streams have been previously disturbed from project related activities and/or if reference streams will also be either temporarily or permanently crossed by the project.

Moreover, EPA is providing the following comments in response to the document titled USACE\_EPA RFI 2022.08.12, which covers baseline condition data and reference reach selection.

1. The document states, “the pre-crossing inspection also includes the completion of a Pre-construction Resource Crossing Checklist to confirm that site conditions have not materially changed since the baseline information was collected. If significant changes have occurred, the crossing will not proceed until a new survey is completed. The pre-crossing inspection process serves several functions, including to document any changes to streams since the baseline assessment data were collected. The pre-crossing inspection will create a current snapshot of the stream condition to guide restoration and later evaluations of restoration success.” To better understand the process, EPA recommends providing details on how this procedure will be applied for streams that do not have baseline data but rather are proposing to utilize reference reach data. Additionally, if able to collect prior to crossing, EPA recommends replacing reference reach data with the actual stream reach baseline information.
2. The document continues, “In areas where the supplemental surveys could not be completed on a stream segment that had an existing timber mat crossing or other restriction, Mountain Valley will use the data that were collected directly upstream and/or downstream of the crossing within the right-of-way to generate a reasonably certain inference of the conditions within the crossing.” EPA recommends using a least disturbed site with similar characteristics (i.e. flow regime, gradient, topography, pattern, profile, and dimensions of the stream channel, etc.) for reference reaches.
3. Below is a list of reference reaches that illustrate the above observations and recommendations. This list is to provide examples and is not exhaustive.
  - a. S-G47/UNT TO WIND CREEK/SUMMERS COUNTY/TIMBER MAT CROSSING. S-G47 is an ephemeral stream channel that was unable to be sampled due to lack of flow. The proposed reference reach is S-G49, which is characterized as a perennial flowing stream channel. EPA is concerned with the use of S-G49 as a reference reach since the different flow regimes may also indicate different resource characteristics such as gradient, pattern, profile, and dimension, macroinvertebrate life and habitat, etc. Additionally, it is unclear if S-G49 has been, or will be, impacted by the project. Thus, EPA recommends an alternative reference site if the resource will be crossed.

- b. S-MM45/UNT TO LITTLE JACKS CREEK/FRANKLIN COUNTY/TIMBER MAT CROSSING is another example of a perennial channel, S-MM44, proposed as a reference for an ephemeral channel that could not be sampled. The reference stream rationale includes language stating that "Mountain Valley used a conservative approach and selected S-MM44 as a suitable reference stream." Please define what is meant by a "conservative approach."
- c. S-J37/UNT TO BARBECUE RUN/BRAXTON COUNTY/TIMBER MAT CROSSING is an intermittent stream with S-L51, a perennial stream, proposed as reference reach. S-L51 will also be temporarily impacted by the project. While S-L51 may be an appropriate reference reach, EPA recommends collecting baseline data prior to any temporary impacts or utilizing another reference reach.

In addition to the comments above, EPA requests a copy of the baseline monitoring reports. EPA also requests this data be shared in an editable format.